

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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JESSE CLUBB,

Plaintiff,

Case No.: 20-CV-01683-WCG

v.

MARINETTE COUNTY, SHERIFF JERRY  
SAUVE, JOHN DOES 1-10, ADVANCED  
CORRECTIONAL HEALTHCARE, INC., BRIAN  
WRUK, ASHLEY ELAND, DOCTORS 1-10,  
NURSES 1-10, WISCONSIN COUNTY MUTUAL  
INSURANCE COMPANY, ARAMARK  
SERVICES, INC., ABC INSURANCE COMPANY,  
DEF INSURANCE COMPANY, GHI INSURANCE  
COMPANY, and JKL INSURANCE COMPANY,

Defendants.

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**PLAINTIFF'S RESPONSE TO DEFENDANT ADVANCED CORRECTIONAL  
HEALTHCARE, INC.'S PARTIAL MOTION TO DISMISS  
COUNTS 1 AND 4 OF PLAINTIFF'S COMPLAINT**

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Plaintiff Jesse Clubb, by his counsel, Cade Law Group LLC, hereby stipulates to the dismissal, without prejudice, of Count 1 of Plaintiff's Complaint against Defendant Advanced Correctional Healthcare, Inc. Plaintiff hereby consents to the dismissal, with prejudice, of Count 4 of Plaintiff's Complaint against Advanced.

Dated this 19th day of January, 2021.

**CADE LAW GROUP LLC**

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